

I am writing to support the proposed change to Part 97, RM-10787.

I currently hold an Extra Class amateur radio license and have been licensed since 1984. I was required to pass a 13 word per minute test in Morse Code proficiency to gain voice privileges on the HF amateur bands. While I was able to do so with some difficulty many other good amateur radio operators and potential amateur radio operators were not. I am currently proficient in Morse Code, and I can send and receive at 30 words per minute. While I consider Morse Code to still be an interesting and useful mode for the radio hobbyist, it is by no means a necessary skill to contribute to the Amateur Radio Service in a meaningful way.

Most emergency communications today is either voice or data. I am a member of ARES and I consistently volunteer to aid in emergency communications. I have never used Morse Code in this capacity. One of the primary justifications for the allocation of valuable radio spectrum to the Amateur Radio Service is that radio amateurs provide a pool of trained, skilled radio operators for traffic handling in emergency situations. The Morse Code examination requirement constitutes a barrier to licensing highly qualified, technically competent individuals who simply do not have a talent for Morse Code and effectively reduces the pool of such radio operators for emergency communications. It also reduces the number of hams who might otherwise advance the state of radio technology.

The Morse Code proficiency examination had been reduced to little more than a hazing ritual. The 5 WPM test currently given as Element 1 is insufficient for someone to be considered proficient. A large number of those who have passed Morse Code examinations at 5, 13, or even 20 words per minute did so only to obtain their desired class of license and never again found a need or reason to use Morse Code. Most could not pass the examination today if retesting were required of them.

Some will argue that the Morse Code proficiency examination will "filter out" undesirable people from the Amateur Radio Service. If one listens to communications across the frequencies authorized for use in the Amateur Radio Service the most significant level of communications which is either in violation of Part 97 or simply an example of poor operating procedure is the 75 meter voice allocation between 3.8 and 4.0 MHz. All of the poorest operators passed Morse Code proficiency examinations.

Morse Code, while tremendously important in the history of radio communications, is no longer relevant to 21st century voice, video, or data communications. I support the elimination of Morse Code examinations in the Amateur Radio Service.